

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

Pablo Camacho Candelario & Jennifer  
Rodriguez Cruz,  
*Debtors.*

**Case No. 17-02357 MCF**

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Pablo Camacho Candelario & Jennifer  
Rodriguez Cruz

*Plaintiffs*

v.

Gloria L. Carrillo Sánchez, et al.

*Defendants.*

**Adv. Proc. No. 19-00029-MCF**

Willful Violation of Automatic Stay &  
Discharge Injunction & Damages

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**JOINT MOTION TO SET ASIDE ENTRY OF DEFAULT**

**TO THE HONORABLE COURT:**

COME NOW Plaintiffs and Gloria L. Carrillo Sánchez, through their respective undersigned attorneys and respectfully **ALLEGE, STATE AND PRAY:**

1. The appearing parties have discussed amicably and in good-faith, the allegations and request of co-defendant's "Motion to Quash Process of Service" (Docket No. 32) and agreed to jointly request this Honorable Court to set aside the entry of default (Docket No. 19) on Gloria L. Carrillo Sánchez.

2. Gloria L. Carrillo Sánchez voluntarily consent to this Honorable Court's jurisdiction and will answer the complaint on or before 29<sup>th</sup> of November, 2019.

**WHEREFORE**, Plaintiffs and co-defendant Gloria L. Carrillo Sánchez, respectfully request that the default entered against Gloria L. Carrillo Sánchez (Docket No. 19) be vacated and set aside and also for this Court to allow appearing co-defendant until November 29, 2019 to answer the complaint.

**CERTIFICATE OF SERVICE: I HEREBY CERTIFY** that on this same day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will end automatically notifications of such filing to all attorneys of record.

In Caguas and Ponce, Puerto Rico, this 15<sup>th</sup> of November, 2019.

***s/Elias L. Fernandez-Perez***

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